

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JOHN DOE,)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO.
)	1:20-cv-04022-SDG
BOARD OF REGENTS OF THE)	
UNIVERSITY SYSTEM OF)	
GEORGIA, et al.,)	
Defendants.)	

**CONSENT MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF
AND RESPONSE TO PLAINTIFF’S MOTION TO PROCEED UNDER A
PSEUDONYM**

Defendants Jere Morehead, Janyce Dawkins, Edward Tate, Board of Regents of the University System of Georgia, University of Georgia, University of Georgia Equal Opportunity Office, and University of Georgia Athletic Association, Inc.,¹ by and through counsel, and with the consent of Plaintiff, respectfully move for an extension of time to file a reply in support of their motions to dismiss Plaintiff’s amended complaint, as well as their response to Plaintiff’s motion to proceed under a pseudonym:

1. On February 18, 2021, Plaintiff filed an amended complaint. ECF 46.
2. These Defendants filed motions to dismiss the amended complaint on March 18, 2021. ECF 55, 56.

¹ In the amended complaint, Plaintiff refers to this defendant as “Georgia Athletic Association,” but its correct name is “University of Georgia Athletic Association, Inc.”

3. Plaintiff filed an initial response to those motions on April 1, 2021. ECF 61, 62.

4. Thereafter, on April 11, 2021, Plaintiff filed an amended response brief, along with a motion to proceed under a pseudonym.

5. This Court extended these Defendants' time to file their reply briefs to Monday, April 26, 2021.

6. Defendants' response to Plaintiff's motion to proceed under a pseudonym is also due on Monday, April 26, 2021.

7. Defense counsel is currently working on these briefs. However, the undersigned counsel will be unable to finish them prior to the deadline due to the second Covid vaccine and its aftereffects. Defendants therefore anticipate needing a short one-week extension of time.

8. Plaintiff's counsel consents to the proposed extension.

WHEREFORE, these Defendants request that this Court grant their motion and extend the time for them to file their reply briefs and their response to Plaintiff's motion to proceed under a pseudonym through and including May 3, 2021. A proposed order is attached for the Court's convenience.

Respectfully submitted,

CHRISTOPHER M. CARR 112505
Attorney General

KATHLEEN M. PACIOUS 558555
Deputy Attorney General

ROGER A. CHALMERS 118720
Senior Assistant Attorney General

/s/ Ellen Cusimano
ELLEN CUSIMANO 844964
Senior Assistant Attorney General

Ellen Cusimano
State Law Department
40 Capitol Square SW
Atlanta, GA 30334
Tel: (404) 463-8850
Fax: (404) 651-5304
Email: ecusimano@law.ga.gov
Counsel for Defendants Morehead, Dawkins, Tate, UGA, and BOR

/s/ Edward Tolley
EDWARD TOLLEY 714300

Cook & Tolley, LLP
304 East Washington St.
Athens, GA 30601
(706) 549-6111
etolley@cooktolley.com
Counsel for Defendant University of Georgia Athletic Association, Inc.

CERTIFICATE OF SERVICE

I certify that I have this day served the foregoing pleading with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

This 21st day of April, 2021.

/s/ Ellen Cusimano
Ellen Cusimano